



May 3, 2024

Application GRANTED, subject to reconsideration in the event that any party or third party files a motion to unseal a particular document or documents. The Clerk is directed to terminate ECF No. 24.

Rachel Sherman
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Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1105
New York, NY 10007

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', written over the date 'May 6, 2024'.

May 6, 2024

Re: *ChemImage Corp. v. Johnson & Johnson et al.*, No. 1:24-cv-2646 (JMF)
Letter Motion Seeking Leave to File Document in Redacted Form

Dear Judge Furman:

We represent Defendants Johnson & Johnson and Ethicon, Inc. (together, “Defendants”). We write pursuant to this Court’s Standing Order 19-MC-583, Section 6 of the S.D.N.Y. Electronic Case Filing Rules and Instructions, and Rule 7(C) of the Court’s Individual Rules and Practices in Civil Cases to respectfully seek leave to file the Memorandum of Law in Support of Defendants’ Partial Motion to Dismiss in redacted form on ECF.

The Memorandum contains reference to certain cash consideration and milestone payment and royalty amounts that the Court previously allowed the parties to redact from the Complaint and its exhibit. *See* Dkt. 16. As the Court previously held, these redactions remain narrowly tailored to protect competitive business information that courts routinely seal. *See, e.g., Regeneron Pharms., Inc. v. Novartis Pharma AG*, No. 1:20-cv-05502, 2021 WL 243943, at *1 (S.D.N.Y. Jan. 25, 2021).

Defendants respectfully request that the portions of the Memorandum identified above and highlighted in both the publicly-filed and filed-under-seal versions accompanying this submission be permitted to be filed in redacted form.

Respectfully submitted,

/s/ Rachel Sherman

Rachel Sherman

*Counsel for Defendants Johnson &
Johnson and Ethicon, Inc.*

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cc: All counsel of record (via ECF)